

**VICTORIA L. SCHNEIDER**  
*Litigation Paralegal*

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April 13, 2007

**VIA FEDERAL EXPRESS**

Mr. Derek Phelps  
Executive Director  
Connecticut Siting Council  
10 Franklin Square  
New Britain, CT 06051

**RECEIVED**  
APR 13 2007  
**CONNECTICUT  
SITING COUNCIL**

**Re: Optasite Towers LLC and Omnipoint Communications, Inc.**  
**1294 Pleasant Valley Road North, Groton, Connecticut**

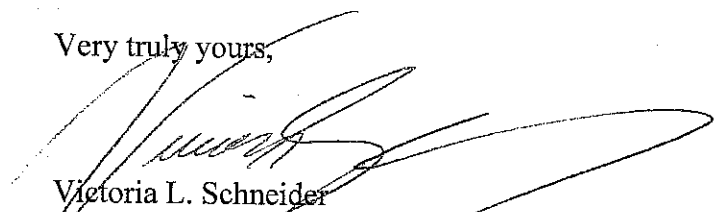
Dear Mr. Phelps:

Enclosed please find twenty-one (21) copies of each of the following testimony:

- Tom Flynn
- Scott Heffernan
- Rodney Bascom
- Michael Koperwhats

If you have any questions or require additional information, please do not hesitate to contact me.

Very truly yours,

  
Victoria L. Schneider  
Litigation Paralegal

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

RECEIVED  
APR 13 2007

CONNECTICUT  
SITING COUNCIL  
DOCKET NO. 330

IN RE:

APPLICATION OF OPTASITE TOWERS LLC AND  
OMNIPOINT COMMUNICATIONS, INC.  
FOR A CERTIFICATE OF ENVIRONMENTAL  
COMPATIBILITY AND PUBLIC NEED FOR  
THE CONSTRUCTION, MAINTENANCE AND  
OPERATION OF A TELECOMMUNICATIONS  
FACILITY AT 1294 PLEASANT VALLEY ROAD  
NORTH IN THE TOWN OF GROTON, CONNECTICUT DATE: APRIL 11, 2007

**PRE-FILED TESTIMONY OF TOM FLYNN**

Q1. Mr. Flynn, please summarize your professional background in telecommunications.

A. Since May of 1996, I have served as a consultant to the wireless industry in the acquisition and permitting of new sites. My roles during that time have included oversight of new tower development for sites throughout Connecticut, management of carrier collocation efforts, and pursuit of local zoning matters for carriers. I am currently involved in site selection and design, development and support of applications and municipal and community relations associated with Optasite's and T-Mobile's efforts to develop new tower sites in Connecticut.

Q2. What is the purpose of your testimony?

A. My testimony provides background information relating to this application for a Certificate of Environmental Compatibility and Public Need for the proposed Manchester facility. In addition, I will address the specific site search resulting in the proposed site as well as both Optasite and T-Mobile's activities prior to initiation of this application.

Q3. What is Optasite's and T-Mobile's relationship in this application?

A. As described in detail below, Optasite has a working relationship with T-Mobile to co-develop new tower facilities in the State of Connecticut. T-Mobile identified a need for a new facility in this area of Manchester and Optasite conducted the site search. The arrangement between T-Mobile and Optasite provides for Optasite and T-Mobile to make a joint application to the Council; for Optasite to own, construct and maintain the site as the Certificate holder; and for T-Mobile to serve as the anchor tenant.

Q4. How does Optasite conduct a site search?

A. Optasite maintains close relationships with T-Mobile as well as other wireless carriers, follows the development activities of others and has an in-depth understanding of the fluctuating market conditions. When T-Mobile (or another wireless carrier) contacts Optasite regarding the need for a new facility, Optasite conducts an extensive review of the area. The first activity after assignment of a search ring to acquisition personnel is a review of the area for a suitable existing structure. Only once Optasite exhausts its search for existing structures on which to locate does it then begin to study the area for suitable locations to construct a new facility. Optasite first studies the area to determine whether industrial or commercial areas which have appropriate environmental and land use characteristics are present. Potential locations are studied by radio frequency engineers to determine whether the locations will meet the technical

requirements for a site in the area. Obviously, the list of potential locations is further refined based on the willingness of property owners to make their property available.

Q6. Please describe Optasite's search for the proposed Groton wireless facility.

A. Optasite commenced a search for a site in this area of Groton in May, 2006. In that area, Optasite found no existing towers suitable for use as a wireless communications facility. The nearest tower(s) suitable for use as a wireless communications facility are outside of T-Mobile's search area or not useable due to existing terrain in the area. In addition, Optasite identified no existing structures which were suitable for use and available. Specifically, Optasite investigated the water tank located on the Naval sub base (located on Route 12) and were told that, because of security reasons, the water tank was not available for collocation.

Turning to locations for a new tower proposal, Optasite found that site selection in the area was limited by existing development throughout the area. The JFM Enterprises property was uniquely suited to development of a tower site due to its size, ground elevation and natural screening due to mature vegetation on the Site. At approximately 3.66 acres in size, it is significantly larger than other properties in the area. While the Site is utilized for a dog kennel/dog grooming facility, large portions of the property are undeveloped and contain mature vegetation. In addition, because of the existence of a dirt driveway,

development of the proposed Facility at the Site will not require the removal of any trees.

Q7. Have the Applicants consulted with municipal officials with regard to their plans?

A. Yes. In compliance with Section 16-50/(e), consultation with municipal officials was undertaken by Optasite. On December 15, 2006, Optasite provided technical information to the towns of Groton and Ledyard. On January 23, 2007, Optasite met with the officials from the Town of Groton including Mark Oefinger, Town Manager and Michael J. Murphy, Town Director of Planning and Development. Optasite contacts officials from the Town of Ledyard on numerous occasions and the Town of Ledyard declined the opportunity to meet with Optasite to discuss the proposed Facility.

Neither town chose to conduct any public sessions concerning the proposal.

Q8. Has Optasite received any indications from the Town of Groton that it is interested in locating emergency service equipment at this Site?

A. Yes, the Town of Groton has indicated that it currently has a gap in its emergency services coverage in this area of Groton and that, at some point in the future, it is interested in locating its emergency services equipment on the proposed Facility. Optasite will continue to reserve space on the proposed Facility for the Town of Groton free of charge.

Q9. Has Optasite contacted any other wireless carriers regarding their need for service in this area and, if so, what response as Optasite received?

A. Optasite has been in contact with Verizon and Sprint-Nextel. Both carriers have expressed a general interest regarding locating on the proposed tower, however, neither have entered into a lease or memorandum of agreement.

The statements above are true and complete to the best of my knowledge.

4/11/07  
Date

  
Tom Flynn

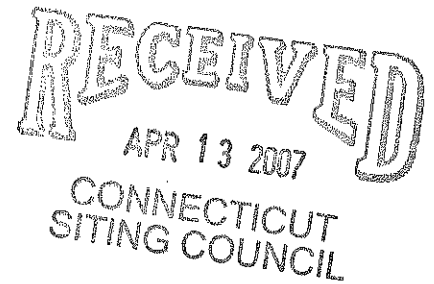
Subscribed and sworn before me this 11 day of April, 2007.

By:

  
Notary

MARY BETH TRAUTMAN  
NOTARY PUBLIC  
MY COMMISSION EXPIRES APR. 30, 2009

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL



IN RE:

APPLICATION OF OPTASITE TOWERS LLC AND OMNIPOINT COMMUNICATIONS, INC.  
FOR A CERTIFICATE OF ENVIRONMENTAL  
COMPATIBILITY AND PUBLIC NEED FOR  
THE CONSTRUCTION, MAINTENANCE AND  
OPERATION OF A TELECOMMUNICATIONS  
FACILITY AT 1294 PLEASANT VALLEY ROAD  
NORTH IN THE TOWN OF GROTON, CONNECTICUT DATE: APRIL 11, 2007

DOCKET NO. 330

**PRE-FILED TESTIMONY OF SCOTT HEFFERNAN**

Q.1. Please summarize your professional background in telecommunications.

A. My career in the wireless industry has spanned the past eleven years. For the past two years, my responsibilities as a contractor for T-Mobile have included the design and integration of the T-Mobile wireless network. Prior to this period, I was responsible for the design, integration, optimization and management of network buildouts for commercial wireless carriers, including Nextel, AT&T Wireless, Cingular, and Voicestream (T-Mobile's predecessor). Additionally, I have been involved in network design for government entities such as the Department of Homeland Security, Department of the Army, Department of the Navy, and the United States Marine Corps.

Q.2. What does your testimony address?

A. The purpose of my testimony is to provide information relating to T-Mobile's existing network in this area of the state and to describe the need for a

proposed facility in the area. This includes information on the general design of T-Mobile's network and the technical constraints in selecting proposed facilities.

Q.3. Please describe T-Mobile's wireless network in Connecticut.

A. T-Mobile's predecessor entities began building a wireless network to provide PCS service in Connecticut in the mid 1990s. T-Mobile is licensed by the Federal Communications Commission to provide PCS service using frequencies in the 1900 MHz range. T-Mobile operates approximately 550 sites in Connecticut. Current efforts are directed to providing signal to areas without coverage and meeting demand for additional capacity within areas already served. Each new site must be chosen to meet the need for coverage and/or capacity without creating RF interference among sites.

Q.4. What requirements does the nature of wireless technology place on T-Mobile's selection of cell site locations?

A: Like all personal communications service providers, T-Mobile's wireless network is based on the principle of frequency reuse. Cell site locations must be chosen to provide for sufficient signal strength overlap to allow call hand-off between cells without creating unnecessary duplicative coverage and frequency interference. Terrain variations and local land use policies and development further limit cell site locations.

Technological advances in service, such as the availability of data and video services through customer handsets, are also significant factors in system

development. Increased customer demand and expectations resulting from those advances drive the need for additional sites.

T-Mobile's required lower limit threshold is -84 dBm, which is expected to provide reliable in-vehicle coverage. A higher threshold level of -76 dBm is the minimum required to provide reliable in-building coverage. At levels below the -84 dBm threshold, signal degradation would be expected to result in areas of unreliable service to T-Mobile customers for voice and data services. In addition, levels below -84 dBm would adversely affect T-Mobile's ability to provide reliable E-911 services as mandated by the federal government.

Q.5. Please describe T-Mobile's need for the proposed site.

A. The interrelationship between the proposed Site and T-Mobile's existing system (including recently approved but not yet on-air sites) is depicted in the propagation plots included in Exhibit F of the Application. As shown, this proposed Site is needed primarily to provide new coverage along Route 12, Route 32 and the surrounding area.

Q.6. How did T-Mobile analyze the proposed sites?

A. T-Mobile's RF engineers first utilized propagation prediction tools to determine the potential effectiveness of the proposed locations in meeting the identified coverage need. That analysis confirmed that the Site would provide signal within the coverage gap along Route 12 and would improve service generally within the area.

In order to determine the minimum height required to achieve the coverage objective, T-Mobile then conducted a drive test. The drive test allowed T-Mobile to gather accurate signal strength measurements along the target routes at various heights.


The drive test revealed that an antenna center line of 137' would allow T-Mobile to achieve the coverage objective levels in this area. At 127' and below, the coverage along Route 12 starts to break apart and fall below the T-Mobile minimum required threshold of -84 dBm. For that distance, T-Mobile users would be likely to briefly experience poor service quality in this area. At the test height of 137' AGL, the results confirm slightly increased degradation in the area east of the proposed facility along Route 12, but just within the minimum requirements of T-Mobile's design criteria.

Q.7. Please summarize the basis for the height of this proposed facility

A. Based upon the results of the drive test conducted at the proposed Groton facility, the minimum height required to fully cover the intended coverage objective is 137' AGL. At heights below 137' AGL, the coverage within the target area of Route 12, starts to fall below the required minimum T-Mobile coverage threshold of -84 dBm. A minimum height of 137' at the Site to locate T-Mobile's antennas, will allow T-Mobile to provide adequate coverage within the targeted portion of Route 12 and the surrounding area.

The statements above are true and complete to the best of my knowledge.

4/11/07  
Date

  
Scott Heffernan

Subscribed and sworn before me this 11<sup>th</sup> day of April, 2007.

By: Karen M Bartholomew  
Notary

KAREN M. BARTHOLOMEW  
NOTARY PUBLIC  
MY COMMISSION EXPIRES APR. 30, 2008

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

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APR 13 2007

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IN RE:

APPLICATION OF OPTASITE TOWERS LLC AND  
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THE CONSTRUCTION, MAINTENANCE AND  
OPERATION OF A TELECOMMUNICATIONS  
FACILITY AT 1294 PLEASANT VALLEY ROAD  
NORTH IN THE TOWN OF GROTON, CONNECTICUT DATE: APRIL 3, 2007

**PRE-FILED TESTIMONY OF RODNEY BASCOM, P.E.**

Q1. Mr. Bascom, please state your name and position.

A. Rodney Bascom and I am a Civil Engineer at Clough Harbour &  
Associates, LLP ("CHA"). CHA is located at 2139 Silas Deane Highway, Suite  
212, Rocky Hill, Connecticut.

Q2. Please state your qualifications.

A. I received a bachelor's degree in civil engineering from Clarkson  
University in 1982. I am a licensed civil engineer in the State of Connecticut. I  
have worked in the engineering field for over 24 years and have been employed  
by CHA for 20 years. I have managed and assisted in the permitting of more  
than 1,000 wireless telecommunications facilities in New England and New York.

Q3. Please describe your involvement in this matter.

A. CHA was responsible for designing and preparing the site plans for  
the proposed Facility including the site access plan, the compound plan and

tower elevation. In addition, CHA conducted a tree inventory of the site to determine the number of trees with a diameter of 6 inches or larger that would need to be removed for the construction of the site access driveway and compound.

Q4. Please describe the site.

A. The site is located at 1294 Pleasant Valley Road North in Groton (the "Property"). The Property is zoned RU 20 and is located on Assessor's Map 1780, Block 1047, Lot 143. The Property is 3.66 acres in size and is partially developed. The property is owned by JFM Enterprises LLC and is currently used as a dog boarding and grooming business with an associated building and parking lot although portions of the Property are unused and wooded. The leased area is located in the north central portion of the Property. The Property is an ideal location for a telecommunications facility due to the topography, size and existence of mature trees and vegetation on the Property.

Q5. Please describe the access driveway.

A. The access driveway would result in minimal land disturbance and would require no tree removal due to the fact that the co-applicants will partially utilize an existing driveway on the Property. That driveway extends from Pleasant Valley Road north to the kennel building and associated parking lot on the Property. From the existing parking lot, a new gravel access driveway would extend to the proposed Facility and compound area.

Q6. Please describe the proposed Facility.

A. The proposed Facility would consist of a 140-foot monopole and associated equipment compound and access driveway. The compound area is 50 foot by 50 foot and will be fenced in with a chainlink fence and associated gate. The proposed Facility will accommodate antenna arrays and equipment for co-applicant Omnipoint Communications, Inc. ("T-Mobile"). In addition, the proposed Facility is able to accommodate antenna arrays and equipment for three additional carriers.

The statements above are true and complete to the best of my knowledge.

4/11/07  
Date

Rodney A. Bascom  
Rodney A. Bascom, P.E.

Subscribed and sworn before me this 11 day of April, 2007.

By:

Cathy A. Diana  
Notary

CATHY A. DIANA  
NOTARY PUBLIC  
MY COMMISSION EXPIRES JAN. 31, 2012

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

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NORTH IN THE TOWN OF GROTON, CONNECTICUT DATE: APRIL 11, 2007

**PRE-FILED TESTIMONY OF MICHAEL KOPERWHATS**

Q1. Mr. Koperwhats, please state your name and position.

A. Michael Koperwhats and I am planner working within Vanasse Hangen  
Brustlin, Inc. ("VHB"). VHB is located at 54 Tuttle Place in Middletown,  
Connecticut.

Q2. Please state your qualifications.

A. I have a masters degree in Urban and Regional Planning from Hunter  
College of the City University of New York. My background includes nearly  
eleven years of professional planning experience, including over seven years of  
experience of various telecommunications regulatory and support work. As such,  
I have assisted in the permitting of more than 300 wireless telecommunications  
facilities in New York and New England during the past seven years. My  
responsibilities include coordination and oversight of site screenings and  
environmental assessments to fulfill National Environmental Policy Act ("NEPA")  
requirements, visual impact analyses and regulatory permitting support.

Q3. Please describe your involvement in this matter.

A. VHB was responsible for preparing a Visual Resources Evaluation report for the proposed site at 1294 Pleasant Valley Road North in Groton (the "Site"), which is located on property owned by JFM Enterprises, LLC and operated as a dog kennel/dog grooming facility. The purpose of this Visual Resources Evaluation Report was to evaluate the potential visibility of the proposed telecommunications facility ("Facility") from the surrounding areas.

VHB was responsible for conducting a wetlands inspection of the Site and preparing a Wetlands Inspection Report. VHB also conducted a Phase I Environmental Site Assessment. In addition, VHB was responsible for reviewing environmental resource information under the National Environmental Policy Act ("NEPA"). Finally, VHB supervised a Preliminary Archeological Assessment of the Site.

Q4. Please describe the process for conducting the Visual Resource Evaluation.

A. At the request of Optasite, VHB conducted the Visual Resource Evaluation (found at Exhibit K of the Application), which included the preparation of a computer-generated viewshed map and performing a balloon float test at the Site on February 12, 2007. The balloon float test consisted of floating a balloon, four feet in diameter, to the height of 140 feet at the Site. Once the balloon was aloft, VHB staff photographed the crane from numerous vantage points within a two-mile radius (the "Study Area") to determine the actual locations where the

proposed tower will be visible. The location of each photograph was recorded using a hand-held GPS receiver and subsequently plotted on a USGS 7.5 Minute topographic quad map, utilizing ESRI's ArcView® Spatial Analyst software, to indicate their approximate distance and relative location to the proposed Facility.

Q5. How were the representative locations chosen?

A. Several photo locations were selected prior to the in-field evaluation, utilizing a preliminary version of the viewshed map to identify areas adjacent to public roads from where the proposed Facility might be visible. Other locations were identified based on in-field observations made during the time that the photographic documentation was being conducted, including areas along public roadways where the tower may be partially visible.

Q6. Please describe how you prepared the viewshed analysis for the Visual Resources Evaluation.

A. Using ESRI's ArcView® Spatial Analyst, a computer modeling tool, the areas from which the top of the tower is expected to be visible are calculated. This is based on information entered into the computer model, such as tower height, its ground elevation, existing vegetation and surrounding topography. Data incorporated in the model includes 7.5 minute digital elevation models ("DEMs") and a digital forest layer for the project area. The forested areas within the study area are overlaid on the DEMs and then a series of constraints are applied to the computer model to achieve a realistic estimate of where the tower will be visible from within the surrounding landscape.

Also included in the viewshed model is a data layer, obtained from the Connecticut State Department of Environmental Protection ("DEP"), which depicts various land and water resources such as state parks and forests, recreational facilities, dedicated open space and DEP boat launches. Additionally, information is gathered from the Connecticut State Department of Transportation ("DOT") and local officials to determine if there are any state or locally designated scenic or historic roadways.

Q7. Please describe the visibility of the proposed Facility.

A. Areas from which the proposed Facility will be at least partially visible year-round comprise approximately 245 acres or roughly 3% of the entire study area, with all but 5 acres of the anticipated visibility occurring over the open water of the Thames River and at the U.S. Naval Reservation located to the west of the proposed Facility. The proposed Facility will be visible along portions of Pleasant Valley Road North, Ohio Avenue and portions of Murphy's Drive. The size of the host property and the existing mature vegetation on the site serve to minimize the visual effects of the proposed Facility. We estimate approximately 8 residences will have partial views of the proposed Facility.

In addition, the proposed Facility will be at least partially visible seasonally (during "leaf off" conditions) from an additional 37 acres and approximately an additional 10 residences. Because of their size and height, several of the taller buildings located on the U.S. Naval Reservation reduce any potential seasonal visibility of the proposed Facility to the west.

Q8. Will the proposed Facility have any impact on any sensitive visual receptors such as scenic, historic or recreational sites or parks?

A. No, the proposed Facility will not impact any sensitive visual receptors. There are no state or locally designated scenic roads, no state parks or forests and no historic sites or parks within a 2-mile radius of the proposed Facility.

Q9. Please describe the results of the wetlands inspection conducted by VHB.

A. At the request of Optasite, VHB conducted a wetlands inspection of the property located at 1294 Pleasant Valley Road North in Groton, the results of which are found at Exhibit L of the Certificate Application. VHB reviewed the materials provided by Optasite concerning the location of the proposed Facility, access drive and utility easements. VHB then conducted an in-field review of the property to determine the location of wetlands on the property and the impact of the proposed Facility on any wetlands. Based upon VHB's inspection, no wetlands or watercourses were located within 100 feet of the proposed Facility and leased area. The nearest wetland is approximately 110 feet southwest of the proposed leased area. Therefore, the proposed Facility will not directly or indirectly affect any wetlands or watercourses.

Q10. Please describe the results of the PHASE I Environmental Assessment conducted by VHB.

A. At the request of Optasite, VHB conducted a Phase I Environmental Site Assessment ("PESA") of the property located at 1294 Pleasant Valley Road North in Groton, the results of which can be found at Exhibit I of the Certificate

Application. The PESA was conducted to identify any potential areas of environmental concern at and within the vicinity of the Site. The results of the PESA indicated that no significant environmental concerns exist at the Site. VHB then concluded that no further investigations were required as a result of the PESA.

Q11. Please describe the results of the NEPA screen conducted by VHB.

A. At the request of Optasite, VHB conducted a NEPA screen to determine if the proposed Facility falls under any listed categories of Section 1.1307 under NEPA, the results of which are found at Exhibit O of the Certificate Application. Based upon VHB's review, the proposed Facility does not fall under any listed categories of Section 1.1307. In addition, VHB corresponded with numerous agencies including the State of Connecticut Department of Environmental Protection ("DEP"), the United States Department of the Interior, Fish and Wildlife Service, the Connecticut Commission on Culture & Tourism, Historic Preservation & Museum Division, among others. Based upon the NEPA screen and agency correspondence, the Site is categorically excluded from any requirement for further environmental review by the FCC in accordance with NEPA and no permit is required by that agency prior to construction of the proposed Facility.

Q12. Please describe the results of the Preliminary Archeological Assessment supervised by VHB.

A. At the request of Optasite, VHB supervised Heritage Consultants, LLC, who conducted a Preliminary Archeological Assessment of the property located

at 1294 Pleasant Valley Road North in Groton, the results of which can be found at Exhibit K of the Certificate Application.

The statements above are true and complete to the best of my knowledge.

_____	/s/ Michael Koperwhats _____
Date	Michael Koperwhats

Subscribed and sworn before me this \_\_\_ day of April, 2007.

By: \_\_\_\_\_  
Notary